

# EXHIBIT C

IN THE UNITED STATES COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

LAURA PRESSLEY, ROBERT  
BAGWELL, TERESA SOLL, THOMAS L.  
KORKMAS, and MADELON  
HIGHSMITH,

*Plaintiffs,*

V.

JANE NELSON, in her official capacity as  
the Texas Secretary of State, et al.,

*Defendants.*

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CIVIL ACTION NO. 1:24-CV-318-DII

**AFFIDAVIT OF ANDREA WILSON**

STATE OF TEXAS

COUNTY OF LLANO

www

KNOW ALL BY THESE PRESENTS:

BEFORE ME, the undersigned authority, on this day personally appeared Andrea Wilson, who, having by me been duly sworn, stated as follows:

“My name is Andrea Wilson. I am over the age of eighteen (18) years, of sound mind and fully competent to make this affidavit. All matters stated in this affidavit are true and correct to my personal knowledge.

## Introduction

I am currently the appointed Elections Administrator for Llano County, Texas. I have served in the position of Llano County Elections Administrator since July 2022 and previously was employed with Llano County as the Assistant Chief Deputy County Clerk beginning in March 2018.

As the Elections Administrator, I conduct public training sessions for citizens interested in serving as poll workers. Ms. Highsmith attended one of these trainings. Following the training

session, I emailed Ms. Highsmith with the necessary information to serve as a poll worker and did not receive any indication that she was interested in serving in such a position. Additionally, I am required to conduct public logics and accuracy testing prior to an election to ensure that the equipment is functioning properly and I remember Ms. Highsmith attending one of these testings. The only other communications I have had with Ms. Highsmith is in response to several Public Information Act requests. I have never had any questions, concerns or comments from Ms. Highsmith concerning any of the underlying allegations in this current lawsuit.

### **Llano County Elections**

Upon arrival at a polling location, a registered voter will present a form of Texas Identification as outlined by Texas Election Code. The poll worker utilizes a Knowink Poll Pad. This initial check-in is as follows:

1. A poll worker scans the back of the identification to bring up a voter on the Official List of Registered Voters through the Secretary of State's Texas Election Administration Management System.
2. Voter confirms that their registration information is correct and signs an acknowledgment on the poll pad.
3. A slip of paper with their name, address and ballot style is printed with a barcode. The barcode contains no information other than the correct assigned ballot style for that voter. The verified voter then chooses a piece of blank ballot stock which contains only the election judge's signature. The blank ballot stock has no preprinted information on it and includes only the election judge's signature and guide arrows for direction into the voting system which were added prior to placement on the check-in table.

It is important to note that the poll pad is not linked to any other system and no report can be generated that will link a voter to their voted ballot.

As the voter moves through the process, the voter keeps their blank ballot paper. The slip of paper with the barcode is handed to the poll worker at the next step of the process. The poll worker utilizes the Hart Verity Controller ("Controller") to scan the barcode and verifies the ballot style on the slip of paper matches the ballot style that shows on the controller screen. The Hart Verity Controller is separate and independent and is in no way tied to the Knowink Poll Pad ("poll pad"). Once confirmed to be the correct ballot style, an access code is printed for the voter to utilize at the voting booth at the Hart Verity Duo ("Duo"), also known as a ballot marking device. The Controller and Duo are linked with the various ballot styles and are not linked to the voter's information from the Poll Pad.

Once the voter chooses a voting booth, the Duo screen prompts the voter to enter their access code which communicates with the Controller to push the correct ballot style into that Duo. The voter will then be prompted to insert their ballot paper. Once the blank ballot paper is inserted into the printer at the base of the Duo, the voter can then move through their ballot making their selections. Prior to printing the completed ballot, the voter should verify their choices on the screen.

After confirming their selections, the voter will print their ballot. This is known as the voter's Official Vote Record, the ballot. It is important to note that no data regarding their selections is saved on the Duo once the ballot has been printed. The Official Vote Record cannot be reprinted or duplicated anywhere.

The voter can and should review their printed ballot aka Official Vote Record to ensure all selections are as the voter intended. If a voter determines that an error was made after the Official

Vote Record was printed, there is a process where to spoil their ballot and start the entire process over from the beginning. Otherwise, the voter will be asked to place their ballot into the Hart Verity Scanner. Once the ballot is accepted by the scanner and deposited into the ballot bag, a flag will display on the screen indicating to the voter has cast their ballot. The voter is offered an “I Voted” sticker and they have completed the entire process of voting at the poll location.

Again, it is important to reiterate that there are three (3) separate and independent processes taking place at the polling location – (1) verification that the voter is qualified at the poll pad; (2) the voter has been provided with the correct ballot style and the ability to mark their correct ballot style; and (3) the voter casts their ballot. As discussed above concerning the Controller and Duos linked with the various ballot styles, the various election equipment is not connected in any way and does not share information.

No information printed on the ballot can be connected back to the voter as no information is saved on the Controller and Duo and no reports can be generated identifying any particular voter or unique identifier. A voter could choose to write down the randomly generated unique identifier listed on their printed ballot and release it to the public, as Ms. Highsmith did in this matter. There would still be no way for anyone to identify any other voters or cast ballots. Although a list of unique identifiers can be printed from the Controller, the Controller doesn’t contain personal identifying information as it is not linked to the Poll Pad and cannot be linked to any specific voter. Further, the voter’s selections on their marked ballot are not retained and cannot be reprinted or linked to any unique identifiers.

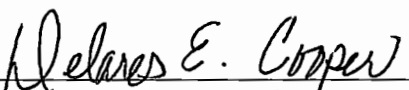
As discussed above, the Knowink poll pad does not issue and print on the ballot the unique identifier through the check in process. As such, Secretary of State Advisory 2024-21 does not apply to the voting process in Llano County.

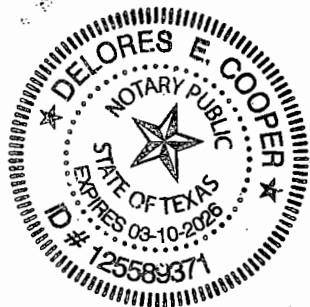
As the Llano County Election Administrator and as a voter, I have complete confidence that my ballot is secret and my constitutional rights have been and continue to be protected with regards to the right to a secret ballot. In Llano County, I administer elections with the Hart system, as described above. As a voter, I live in a county that utilizes the ES&S system. As the voting process in Llano County is described above, the poll pad does not generate the unique identifiers for ballots and is air gapped from the Hart voting system. There are no reports that can be generated that identifies any particular voter with a particular ballot.

All matters stated herein are true and correct to my knowledge”

  
Andrea Wilson, Llano County Elections  
Administrator

SUBSCRIBED AND SWORN before me, to certify which witness my hand and seal of office,  
this 4<sup>th</sup> day of January, 2025.

  
Notary Public, State of Texas





IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

LAURA PRESSLEY, ROBERT BAGWELL, §  
TERESA SOLL, THOMAS L. KORKMAS, §  
and MADELON HIGHSMITH, §

*Plaintiffs,* §

v. §

Civil Action No. 1:24-cv-00318-DII

JANE NELSON, in her official capacity as the §  
Texas Secretary of State, CHRISTINA §  
ADKINS, in her official capacity as the §  
Director of the Elections Division of the §  
Texas Secretary of State, BRIDGETTE §  
ESCOBEDO, in her official capacity as §  
Williamson County Elections Administrator, §  
DESI ROBERTS, in his official capacity as §  
Bell County Elections Administrator, and §  
ANDREA WILSON, in her official capacity as §  
Llano County Elections Administrator, §

*Defendants,* §

**DECLARATION OF ANDREA WILSON**

I, Andrea Wilson, have personal knowledge or knowledge based on my review of business records of Llano County, of all statements below. I hereby make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Andrea Wilson. I am at least 18 years old, of sound mind, and competent to make this declaration. This declaration is meant to supplement my original affidavit dated January 4, 2025. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I have served as the Llano County Elections Administrator since July 11, 2022. As the Llano County Elections Administrator, I organize and conduct elections and serve as the voter registrar for the county, schools, cities and utility districts of Llano County in compliance with state law.

3. On June 24, 2024, the Texas Secretary of State issued Election Advisory No. 2024-

21, which directed county election officials to discontinue the use of computer-generated numbering of ballots by e-pollbooks. *See* Exhibit 1. The Texas Secretary of State also issued new certification standards for electronic e-pollbooks. This advisory and change in certification standards were not applicable to the type of e-pollbook (Knowink Poll Pad) or voting system (Hart Verity) used by Llano County.

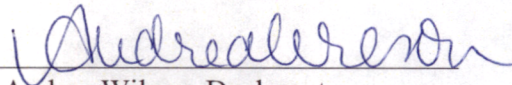
4. The Llano County practice continues to be, to use voting machines that do not permit the computer-generated numbering of ballots by e-pollbooks since Llano County purchased and implemented the use of its current voting system in 2019. Llano County instituted this practice by virtue of the system Llano County purchased and it will remain as policy as directed by the Secretary of State based on state law and the certification standards of Texas.

5. In the Hart Verity voting machine system used by Llano County, the randomly-generated numbers are printed on the ballots at the time the voter prints their ballot as demonstrated in the attached schematic (which is not connected to the electronic e-pollbooks). *See* Exhibit 2.

6. Laura Pressley has alleged in her lawsuit against Llano County and others that she was able to violate the ballot secrecy of 60,000 Williamson County voters through the use of an algorithm and she suspects that the same algorithm can be applied to the Hart Verity system used by Llano County. I have no knowledge of this alleged violation of ballot secrecy and no knowledge of how it could be conceivably accomplished in Llano County.

My name is Andrea Wilson. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Llano County, Texas on April 24, 2025.

  
Andrea Wilson, Declarant



# EXHIBIT 1

**Election Notice: Early voting for the May 3, 2025 Uniform Election runs from Tuesday, April 22, 2025 – Tuesday, April 29, 2025 | Check your county elections website for voting information and polling locations | ID requirements for voting in person | ID requirements for voting by mail**

EFFECTIVE SEPTEMBER 1, 2023, OUR LOBBY WALK-IN HOURS WILL BE 9 A.M. - 4 P.M. (CENTRAL), MONDAY - FRIDAY.



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Note - Navigational menus along with other non-content related elements have been removed for your convenience. Thank you for visiting us online.

## Election Advisory No. 2024-21

**To:** County Clerks/Elections Administrators

**From:** Christina Worrell Adkins, Director of Elections

A handwritten signature in black ink, appearing to read "CWA", is placed over the name Christina Worrell Adkins.

**Date:** June 24, 2024

**RE:** Updated Ballot Numbering Requirements

The purpose of this advisory is to address updated requirements relating to the certification of electronic pollbook systems under Texas Election Code 31.014 and to the use of software methods of ballot numbering under Election Code 52.075.

Under those sections of the Texas Election Code, our office has the authority to adopt specific standards for the certification of electronic pollbook systems and to adopt specific requirements relating to the form and content of electronic voting system ballots, including the methods used to comply with requirements in Texas law relating to the numbering of ballots.

In light of recent events that have highlighted how publicly available records may be used to impact a voter's right to a secret ballot, our office has revised the standards for certification of an electronic pollbook system. Those revised standards prohibit the generation of ballot numbers using electronic pollbook systems or using peripheral devices that directly connect to electronic pollbook systems. Jurisdictions using those systems are now required to use ballot numbering methods that do not involve the use of the electronic pollbook system or peripherals that are directly connected to those systems.



Our office has issued revised Electronic Pollbook Certification Standards including the Texas Electronic Pollbook Functional Standards and the Texas Electronic Pollbook Test Cases. The revised documents will be available on our [website](#).

If you have any questions about the information in this advisory, please contact the Elections Division at 1-800-252-VOTE (8683).

CA

# EXHIBIT 2

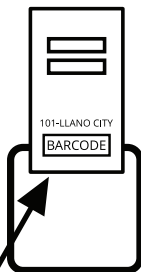


## STEP 1-CHECK-IN

CONTAINS OFFICIAL LIST OF REGISTERED VOTERS

POLLPAD

THE ONLY CORDS ATTACHED TO EITHER  
OF THESE ITEMS IS FOR WALL POWER

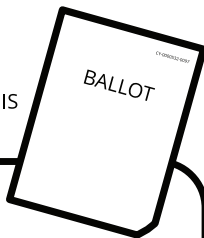


PRINTER

THE PRINTER PRODUCES A TICKET THAT INCLUDES THE  
VOTER'S NAME AND BALLOT STYLE. THE TICKET ALSO HAS  
A BARCODE THAT INCLUDES THE BALLOT STYLE ONLY,  
BUT NO INFORMATION ABOUT THE VOTER.  
THE BARCODE IS READ IN STEP 2.

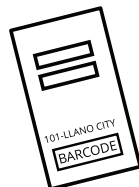
## STEP 3-CASTING THE BALLOT

THE ONLY CORD ATTACHED TO THIS  
ITEM IS FOR WALL POWER



SCANNER/  
BALLOT BOX

## STEP 2-MARKING THE BALLOT



HAND HELD BAR CODE SCANNER

CONTROLLER

ACCESS CODE ISSUED AT  
CONTROLLER SO VOTER CAN  
ACCESS THEIR ASSIGNED  
BALLOT STYLE AT THE DUO

65321

DAISY CHAIN CORD THAT CONNECTS THE CONTROLLER TO THE DUOs  
THE ONLY OTHER CORD ATTACHED TO THESE ITEMS IS  
FOR WALL POWER

DUO  
BALLOT MARKING DEVICE

DUO  
BALLOT MARKING DEVICE

ONCE A VOTER IS DONE MARKING THEIR BALLOT  
ON THE DUO THEY WILL PRINT THE BALLOT. IT IS  
AT THAT TIME THE UNIQUE IDENTIFIER IS PRINTED  
ON THE BALLOT AND THE FIRST TIME ANYONE  
CAN SEE WHAT THAT NUMBER IS. UNLESS A VOTER  
MAKES NOTE OF IT THERE IS NO WAY WAY TO  
CONNECT THE BALLOT TO THE VOTER.

